

FILED

11-15-07
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)

) No. 07 CR 707

v.)

) Violations: Title 21, United
) States Code, Section 846, and

RODNEY TANNER,)
also known as "T-Mac,")

) Title 18, United States Code,
) Sections 922(g)(1), 924(c) and 2.

KEITH CALVERT, and)

FRED CALVERT)

JUDGE RONALD GUZMAN

MAGISTRATE JUDGE COX

COUNT ONE

The SPECIAL JUNE 2007 GRAND JURY charges:

Beginning on or about July 24, 2007, and continuing until on or about October 25,

2007, at North Chicago, in the Northern District of Illinois, Eastern Division,

RODNEY TANNER, also known as "T-Mac,"
KEITH CALVERT and
FRED CALVERT

defendants herein, conspired with each other, and with others known and unknown to the Grand Jury, knowingly and intentionally to possess with intent to distribute controlled substances, namely, in excess of five kilograms of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWO

THE SPECIAL JUNE 2007 GRAND JURY further charges:

On or about October 25, 2007, at North Chicago, in the Northern District of Illinois,
Eastern Division,

RODNEY TANNER, also known as "T-Mac,"
KEITH CALVERT and
FRED CALVERT,

defendants herein, knowingly possessed a firearm, namely, a Raven, .25 caliber semi-automatic pistol, Model P-25, bearing serial number 062655, in furtherance of, and carried that firearm during and in relation to, a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as further set forth in Count One of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT THREE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about October 25, 2007, at North Chicago, in the Northern District of Illinois,
Eastern Division,

KEITH CALVERT and
FRED CALVERT,

defendants herein, each having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, a Raven, .25 caliber semi-automatic pistol, Model P-25, bearing serial number 062655, in that the firearm had traveled in interstate commerce prior to defendants' possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION ONE

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations of Count One of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 21, United States Code, Section 853.

2. As a result of their violation of Title 21, United States Code, Section 846, as alleged in Count One of the foregoing Indictment,

RODNEY TANNER, also known as "T-Mac,"
KEITH CALVERT and
FRED CALVERT

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): any and all of property used, and intended to be used, in any manner or part, to commit and facilitate the commission of the violation.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to, the following: one Raven, .25 caliber semi-automatic pistol, Model P-25, bearing serial number 062655, and ammunition; and one silver, 2005 KIA van with VIN# KNDUP132656703736.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants:

a. Cannot be located upon the exercise of due diligence;

- b. Has been transferred to, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value;
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Counts Two and Three of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), as alleged in Counts Two and Three of the foregoing Indictment,

RODNEY TANNER, also known as "T-Mac,"
KEITH CALVERT and
FRED CALVERT,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in the charged offenses.

3. The interests of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) include, but are not limited to, the following: one Raven, .25 caliber semi-automatic pistol, Model P-25, bearing serial number 062655, and ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY